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*Attorneys for State Farm Mutual Automobile Insurance
Company and its affiliates and subsidiaries*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION and PACIFIC
GAS & ELECTRIC COMPANY,

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and
Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead
Case, No. 19-30088 (DM).*

Case No. 19-30088 (DM)
Chapter 11
Jointly Administered

**STIPULATION BETWEEN STATE FARM
AND AD HOC COMMITTEE OF SENIOR
UNSECURED NOTEHOLDERS EXTENDING
TIME TO RESPOND TO MOTION OF THE
AD HOC COMMITTEE OF SENIOR
UNSECURED NOTEHOLDERS TO
TERMINATE THE DEBTORS' EXCLUSIVE
PERIODS PURSUANT TO SECTION
1121(D)(1) OF THE BANKRUPTCY CODE
[DOCKET NO. 2741]**

[No Hearing Requested]

1 This stipulation and agreement for order (the “Stipulation”) is entered into
2 by (i) State Farm Mutual Automobile Insurance Company and its affiliates and subsidiaries
3 (collectively, “State Farm”), on the one hand; and (ii) the Ad Hoc Committee of Senior
4 Unsecured Noteholders (the “Ad Hoc Committee” and together with State Farm, the “Parties”),
5 on the other hand. The Parties hereby stipulate and agree as follows:
6

7 **RECITALS**

8 A. On June 25, 2019, the Ad Hoc Committee filed the *Motion of the Ad Hoc*
9 *Committee of Senior Unsecured Noteholders to Terminate the Debtors’ Exclusive Periods*
10 *Pursuant to Section 1121(d)(1) of the Bankruptcy Code* (the “Motion”) [Docket No. 2741], which
11 is set for hearing before the Court at 9:30 a.m. (Pacific Time) on July 24, 2019. The notice of the
12 Motion indicated that any response or opposition to the Motion is due by 4:00 p.m. (Pacific Time)
13 on July 16, 2019.
14

15 B. Counsel to State Farm has requested, and counsel to the Ad Hoc
16 Committee has agreed, that the time for State Farm to respond to the Motion be extended.
17

18 **NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH**
19 **ARE INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS**
20 **STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE**
21 **UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE COURT TO ORDER,**
22 **THAT:**

23 1. The time for State Farm to file and serve any response or opposition to the
24 Motion is extended through 4:00 p.m. (Pacific Time) on July 18, 2019.
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Dated: July 15, 2019

DECHERT LLP

/s/ Shmuel Vasser
Allan S. Brilliant (*pro hac vice*)
Shmuel Vasser (*pro hac vice*)
Alaina R. Heine (*pro hac vice*)
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*Attorneys for State Farm Mutual Automobile
Insurance Company and its affiliates and
subsidiaries*

Dated: July 15, 2019

AKIN GUMP STRAUSS HAUER &
FELD LLP

/s/ Ashley Crawford
Ashley Crawford

*Attorneys for Ad Hoc Committee of Senior
Unsecured Noteholders*